

FEDERAL ELECTION COMMISSION Washington, DC 20463

AUG - 8 2013

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT REQUESTED</u>

Robert D. Kurnick, Esq. Sherman, Dunn, Cohen, Leifer & Yellig, PC 900 Seventh St., N.W. Suite 1000 Washington, DC 20001

RE: MUR 6526

Cora Carper

Dear Mr. Kurnick:

This is in reference to the complaint filed by your client, International Association of Heat and Frost Insulators and Allied Workers Political Action Committee ("AWPAC"), with the Federal Election Commission ("Commission") on February 1, 2012. The complaint concerned possible violations of the Federal Election Campaign Act of 1971, as amended, stemming from the embezzlement of AWPAC funds by Cora Carper. On January 10, 2013, the Commission found that there was reason to believe Carper knowingly and willfully violated 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15 by commingling AWPAC funds with her personal funds.

On June 28, 2013, the Commission voted to provide to the U.S. Attorney's Office for filing with the U.S. District Court for the District of Maryland a signed Addendum to Plea Agreement Concerning Conciliation of Civil Violations with the FEC ("Addendum"). The District Court accepted the Addendum on July 2, 2013, and incorporated it into the record in *United States v. Cara Carper*, Case. No. 8:12-CR-0593-GLR, together with the plea agreement, as part of a global settlement. The Addendum constitutes the final conciliation agreement between Carper and the Commission. Accordingly, the Commission closed the file in this matter on August 2, 2013.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). A copy of the agreement is enclosed for your information

If you have any questions, please contact me at (202) 694-1650.

Sincerely, Dawn M. Adversion

Dawn M. Odrowski

Attorney

Enclosure

Addendum/Conciliation Agreement

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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	BEFORE
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UNITED STATES OF AMERICA
)
v.
) Crim. No. GLR 12-CR-059
)
CORA CARPER,
Defendant
)

ADDENDUM TO PLEA AGREEMENT CONCERNING CONCILIATION OF CIVIL VIOLATIONS WITH THE FEC

- 1. Defendant acknowledges that the Federal Election Commission (FEC) has exclusive jurisdiction over civil enforcement of the federal campaign finance laws under the Federal Election Campaign Act of 1971, as amended. 2 U.S.C. §§ 431-57. That jurisdiction extends to violations of the Act and Commission regulations that result from the offense conduct that is the subject matter of the Plea Agreement in this criminal proceeding. See 2 U.S.C. § 432(b)(3); 11 C.F.R. § 102.15. Defendant further acknowledges that the FEC has the authority to seek civil remedies against her for these violations pursuant to 2 U.S.C. § 437g(a)(5).
- 2. Defendant admits that she knowingly and willfully violated 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15 by commingling at least \$180,000 in funds of the International Association of Heat and Frost Insulators & Allied Workers PAC with her personal funds.
- 3. Defendant agrees to cease and desist from violating 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15.
- 4. The FEC may seek a civil penalty for knowing and willful violations of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15 of up to 200 percent of any contribution or expenditure involved in such violations in accordance with 2 U.S.C. § 437g(a)(5)(B). In light of the financial circumstances of the Defendant and her entering into the terms of the Plea Agreement in this

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matter, including Paragraph 11 of that agreement (Restitution), the FEC seeks no civil penalty in its conciliation of this matter.

Defendant agrees not to volunteer or engage in work for any federal political committee or any federal campaign in a capacity involving finances or disclosure reports for a period of five (5) years from the date of the Plea Agreement.

FOR THE FEDERAL ELECTION

COMMISSION

Anthony Herman General Counsel

BY:

Daniel A. Petalas

Associate General Counsel

for Enforcement